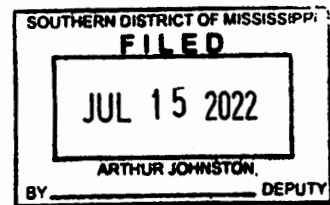


FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

COMPLAINT

Brown
(Last Name) (Identification Number)

Kelly Paul
(First Name) (Middle Name)

Clarke County Jail
(Institution)

444 West Donald St Quitman MS 39335
(Address)

(Enter above the full name of the plaintiff, prisoner and address of plaintiff in this action)

V. CIVIL ACTION NUMBER: 2:22-cv95-TBM-RPM
(to be completed by the Court)

Barry White

Todd Kemp

Keneth Holifield

Jackie Sizzon
(Enter the full name of the defendant(s) in this action)

Clarke County Jail E+A

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated?
Yes (☒) No (☐)
- B. Are you presently incarcerated?
Yes (☒) No (☐)
- C. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
Yes (☐) No (☒)
- D. Are you presently incarcerated for a parole or probation violation?
Yes (☒) No (☐)
- E. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
Yes (☐) No (☒)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
Yes (☒) No (☐)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank.)

I. Name of plaintiff: Kelly Paul Brown Jr Prisoner Number: K7688
 Address: 444 West Donald Street Quitman MS 39335

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions and places of employment of any additional defendants.)

II. Defendant: Barry White / Todd Kemp is employed as Chief Deputy, Jail
administrator, Jail at Clarke County Jail

The plaintiff is responsible for providing his/her address and in the event of a change of address, the new address of plaintiff as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME: Kelly Paul Brown Jr ADDRESS: 444 West Donald Street Quitman
MS 39335

DEFENDANT(S):

NAME:	ADDRESS:
<u>Barry White</u>	<u>Clarke County Jail</u>
<u>Todd Kemp</u>	<u>Clarke County Jail</u>
<u>Kent H. Holifield</u>	<u>Clarke County Jail</u>
<u>Jackie Seaton</u>	<u>Clarke County Jail</u>
<u>Clarke County Jail et al</u>	

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes (✓) No ()
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

CASE NUMBER 1.

1. Parties to the action: Wilkinson county correctional facility
2. Court (if federal court, name the district; if state court, name the county): Southern district ms Natchez
3. Docket Number: I don't remember
4. Name of judge to whom case was assigned: I don't remember
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) Dismissed, I voluntarily dismissed
it

CASE NUMBER 2.

1. Parties to the action: Walnut grove correctional facility
2. Court (if federal court, name the district; if state court, name the county): Southern District Jackson MS.
3. Docket Number: I don't remember
4. Name of judge to whom case was assigned: I don't remember
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) I was made. and
haven't heard nothing

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet(s) if necessary).

On May 19th 2022 I was brought to the Clarke County Jail. Since being here my rights have been violated by Jail administrator Barry White Sheriff Todd Kemp, jailor Keith Whitfield maintenance Janice Sisson. There is no direct sunlight in the cells, no intercom system, I was placed in a cell with no water for over a week. I have no access to law library no grievance process, no hand book, no sprinkler system in case of fire no medical personnel to hand out medicine, no heated food cart no access to media no access to courts. I court appointed lawyer for everyone no disciplinary board corporal punishment, mold in cells and shower, bright lights, open drains. Mail being tampered with All my phone #s blocked no medical ^{RELIEF} Help. Retaliation from staff

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

what ever the courts seems fit.

\$150,000⁰⁰ to be made to a safer Jail

Signed this 11 day of July, 20 22.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Kelly Paul Brown
Signature of plaintiff